

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

CHAMBER OF COMMERCE OF THE UNITED
STATES OF AMERICA, et al.,

Plaintiffs,

v.

JULIE MOORE, et al.,

Defendants,

and

NORTHEAST ORGANIC FARMING
ASSOCIATION OF VERMONT AND
CONSERVATION LAW FOUNDATION,

*Proposed Defendant-
Intervenors.*

No. 24-cv-1513 (MKL)

**NORTHEAST ORGANIC FARMING ASSOCIATION OF VERMONT AND
CONSERVATION LAW FOUNDATION'S MOTION TO INTERVENE AND FOR LEAVE
TO DEFER FILING A RESPONSIVE PLEADING**

Northeast Organic Farming Association of Vermont and Conservation Law Foundation hereby move for permissive intervention in the above-captioned proceeding pursuant to Federal Rule of Civil Procedure 24(b)(1)(B). Movants also seek leave to defer filing their responsive pleading pursuant to Federal Rule of Civil Procedure 24(c) until 14 calendar days after Defendants' deadline to file a responsive pleading. Pursuant to Local Rule 7(a)(7), the undersigned counsel have consulted with the parties to seek agreement to the requested relief. Counsel for Defendants represented that Defendants consent to the relief requested by this Motion. Counsel for Plaintiffs represented that Plaintiffs oppose the requested relief. A Memorandum of Law supporting this motion is attached separately.

Movants respectfully request oral argument.

Dated: March 31, 2025

Respectfully submitted,

/s/ Bridget Asay

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**Motion for pro hac vice forthcoming*

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